

Alison R. Kertis, Esq. (NSB 13875)  
[akertis@sierracrestlaw.com](mailto:akertis@sierracrestlaw.com)  
SIERRA CREST BUSINESS LAW GROUP  
6770 S. McCarran Blvd., Reno, Nevada 89509  
(775) 448-6070, Facsimile: (775) 473-8292  
*Counsel for Defendant BUILD OUR CENTER*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DREW RIBAR,

Plaintiff,

Case No. 3:24-cv-00526

v.

WASHOE COUNTY; WASHOE COUNTY LIBRARY  
SYSTEM; JEFF SCOTT; THANH NGUYEN; JAMIE  
HEMINGWAY; BEATE WEINERT; STACY  
MCKENZIE; JONNICA BOWEN; BEN WEST;  
BUILD OUR CENTER, INC.; STACEY SPAIN;  
ANGELINE PETERSON; CHRISTOPHER DANIELS;  
DEPUTIES ROTHKIN, SAPIDA, GOMEZ; KRISTEN  
RYAN, JENNIFER COLE; and JOHN/JANE DOES  
1-10;

Defendants.

**DEFENDANT  
BUILD OUR CENTER'S  
MOTION FOR LEAVE  
TO EXCEED PAGE  
LIMITS**

Defendant BUILD OUR CENTER INC., by and through its undersigned counsel, and pursuant to R 7.3, respectfully requests the Court allow it to exceed the twenty-four-page limits for motions.

This motion is made and based upon all pleadings and records on file in this proceeding, the *Declaration of Alison R. Kertis, Esq.* which is attached hereto as **Exhibit 1** together with every other exhibit mentioned herein (each of which is incorporated herein), as well as the points and authorities set forth directly below.

**POINTS AND AUTHORITIES**

Good cause exists to enlarge the page limit for Build Our Center's Motion for Preliminary Injunction.

Under LR 7.3(b), motions other than summary judgment are limited to 24 pages. Although LR 7.3(c) provides that the Court disfavors requests to exceed

1 that limit, a court may grant a request to exceed page limit upon a showing of  
2 good cause. That standard is met here.

3 Counsel has diligently worked to keep the Motion for Preliminary  
4 Injunction as concise as possible while still presenting and preserving the factual  
5 record and legal authority necessary to protect BOC's rights. [Dec. Kertis, Ex. 1  
6 at ¶ 5-8.] Given the scope of Mr. Ribar's conduct, the need to detail on the record  
7 multiple instances of harassment, doxing, and stalking, and the complexity of  
8 the legal issues implicated—including statutory claims, constitutional  
9 considerations, and the standards governing injunctive relief—BOC must  
10 include substantial factual development and legal analysis for the Court to fully  
11 and accurately evaluate the request for emergency relief.

12 Because the issues are urgent and cannot be adequately addressed within  
13 the 24-page limit, BOC respectfully requests a modest extension to  
14 approximately thirty-five (35) pages. This limited enlargement is necessary to  
15 ensure the Court receives a complete and coherent presentation of the facts and  
16 law relevant to BOC's motion.

17 DATED November 17, 2025.

18 SIERRA CREST BUSINESS LAW GROUP

19  
20 By: /s/ Alison R. Kertis  
21 Jerry C. Carter, Esq. (NSB 5905)  
22 jccarter@sierracrestlaw.com  
23 Alison R. Kertis, Esq. (NSB 13875)  
24 akertis@sierracrestlaw.com  
25 6770 S. McCarran Blvd., Reno, NV 89509  
26 (775) 448-6070, Fax: (775) 473-8292  
27 Counsel for Defendant BUILD OUR CENTER  
28

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the SIERRA CREST BUSINESS LAW GROUP who, on the below-written date, caused a true copy of the foregoing to be transmitted via email and also to be filed using the above-entitled Court's electronic filing (CM/ECF) system which will automatically e-serve the same) on the person(s) and/or entity(ies) set forth directly below:

**Drew Ribar**

480 Pershing Lane, Washoe Valley, NV 89704

[const2audit@gmail.com](mailto:const2audit@gmail.com)

(775) 223-7899

*Plaintiff in propria persona*

**Lindsay L. Liddell** (SBN 14079)

**Andrew Cobi Burnett** (SBN 16505)

DEPUTY DISTRICT ATTORNEYS

One South Sierra Street, Reno, NV 89501

[lliddell@da.washoecounty.gov](mailto:lliddell@da.washoecounty.gov)

[cburnett@da.washoecounty.gov](mailto:cburnett@da.washoecounty.gov)

(775) 337-5700

*Counsel for Plaintiffs Washoe County and its Library System, Jeff Scott, Stacy McKenzie, Jonnica Bowen, Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida, and Sgt. George Gomez*

DATED: November 17, 2025.

/s/ Veronica Campos

an employee of the  
SIERRA CREST BUSINESS LAW GROUP

**INDEX OF EXHIBITS**

to

DEFENDANT BUILD OUR CENTER'S  
MOTION FOR ~~

re

*Ribar vs. Washoe County, et alia*  
*(Case No. 3:24-cv-00526)*

<b>Exhibit No.</b>	<b>Exhibit Description</b>	<b>Pages (+ Cover)</b>
1.	Declaration of Alison R. Kertis, Esq.	3